2/28/94

STATUS OF NESHAP AUDIT FINDINGS

Finding:	Scheduled completion	Date completed
(1) Reconfiguration of sampling lines.	4/94	
(2) Personnel shortage.	8/94	
(5) Calibration Procedures.	5/94	
(6) Calibration Tags.	7/94	
(7) X-333 BE & X-345 HASA Mass Flowmeter Calibration Protocol.	5/94	
(8) Marking and Identification Placement on Flowmeter Components.	1/94	1/28/94
(10, 12, & 13) Repeated High Background Entries in Maintenance Logbooks.	1/94	1/28/94
(16) Tri-Carb. Liquid Scintillation Counter Tracking Number.	1/94	1/28/94

Finding 1 - Reconfiguration of Sampling Lines

Status: Examination of the design of all sampling lines was completed on February 2, 1994, and the following was determined:

Sampler lines at locations 2, 3, 4, 12, 13, 14, 15 and 16 are considered to be within ANSI standards.

Sampler locations at 5, 6, and 7 are in constrained space and no line changes should be considered for these units at this time due to adverse impact on trap changeout procedures.

Sampler location 8 monitors a pipe stack which is in design review for possible future changes. If this occurs, relocation of the sample probe will be incorporated as part of the design changes and possible shortening of sample lines will be considered at that time.

Sampler locations 1 and 9 are feasible and desirable for further minimizing of line bends. Plans for line replacement and/or modification for these locations will be developed by April 1, 1994, including the projected completion date.

Finding 2 - Personnel Shortage

Status: A requisition (532-21) initiated January 31, 1994, for an additional person to the vent sampling group was not approved due to budgetary constraints. Until such time that funding is made available specifically to address this finding, further action to add staff is deferred indefinitely.

Two individuals of the vent sampling group will be scheduled to take EPA NESHAP training courses at the earliest possible date to broaden the expertise of existing staff in the essentials of stack sampling.

A training module for the vent sampling system is being developed and should be completed by August 1994 to assure trained backup personnel are available to support primary personnel in vent sampling activities.

Findings 5 & 6 Calibration Tags

Status: TSD-523-004 (later superseded by TSD-532-004) specified a rigid annual calibration schedule that was deemed too difficult to fully comply with because of hazardous work permit or other conditions that may prevent planned entry to vent sampler locations on a given date.

Procedure TSD-523-004, Operational Procedures for the Continuous Vent Stack Samplers, will be revised to reflect more recently defined recalibration schedules, uniform protocols for systems where practical and consistency with other vent sampler operating procedures, such as TSD-523-015. Completion date for revision is May 1994.

Stack flow measurement units at sampling locations 12, 13, 14, 15 and 16 are the most recent installations and employ an insertion type of mass flowmeter which was not adequately addressed in TSD-523-004 (formerly TSD-523-004). Recalibration or verification procedures for these units are being developed with an anticipated issue date of July 1994.

Finding 7 - X-333 BE and X-345 HASA Mass Flowmeter Calibration Protocol

Status: Calibration of the two mass flowmeters X-333 BE and X-345 HASA was completed on 3/30/93 and 3/31/93.

Procedure TSD-532-015, Calibration Schedule for Flow Measurement Devices of the Continuous Vent Stack Samplers, was issued May 15, 1993. This procedure specifies revised calibration schedules as noted under Findings 5 & 6 and is being reviewed to assure protocol consistence and interpretation with TSD-532-004 (formerly TSD-523-004). A completion date of May 1994 is anticipated.

Procedures TSD-532-004, Operational Procedures for the Continuous Vent Stack Samplers, will be revised to reflect the recalibration schedule detailed in TSD-532-015 and to ensure appropriate agreement, protocol consistence and interpretation with other operating procedures that pertain to some aspect of the continuous vent stack samplers. Completion date for this revision is May 1994.

Finding 8 - Marking and Identification Placement on Flowmeter Components

Status: As discussed in the status report of January 31, 1994, this finding has been resolved and is considered closed.